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December 13, 2019

Hon. Steven L. Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201-1818

Re: Rani v. Drobenare
1:19-cv-05186 (MKB) (ST)

Dear Judge Tiscione:

Plaintiff submits this letter in accordance with this Court's Order of December 3, 2019 directing counsel to submit a Status Report by December 13, 2019, reporting on how counsel intends to proceed with the case.

By way of background, Plaintiff commenced this action alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq., by Defendant.

The Defendant was properly served and failed to answer or appear. Subsequently, a Certificate of Default was entered against Defendant Drobenare on December 10, 2019. Document Number [7].

Plaintiff ultimately intends to obtain a judgment against the Defendant in favor of plaintiff and the class but requires discovery to ascertain the necessary information.

Plaintiff respectfully requests that the Court allow Plaintiff to issue Phase I Discovery and Phase II Discovery to Defendant and allow Plaintiff to file an updated Status Report in 90 days to further advise the Court of the Status of this matter at that time.

Specifically Plaintiff seeks Discovery as to (a) the number of persons who were sent a letter in the form of **Exhibit A** to the Complaint during the putative class period; (b) Defendant's practices with respect to **Exhibit A** to plaintiff's complaint and (c) the net worth of Defendant.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Abraham Kleinman', with a long horizontal flourish extending to the right.

Abraham Kleinman